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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 NICHOLAS HANSEN, an individual,  
10 Plaintiff,

11 vs.

12 OFFICER THEODOR “TEDDY”  
13 SCHAEFER #9087; OFFICER DARREL  
14 DAVIES #14917; SHERIFF JOE  
15 LOMBARDO; CORNER INVESTMENT  
16 COMPANY, LLC; CAESAR’S  
17 ENTERTAINMENT CORPORATION;  
18 CLARK COUNTY; CLARK COUNTY  
19 DISTRICT ATTORNEY STEVEN  
20 WOLFSON; ASSISTANT DISTRICT  
21 ATTORNEY SAMUEL KERN; DOES 1  
22 through 10; and/or ROE CORPORATIONS 1  
23 through 10.

24 Defendants.

Case No.: 2:19-cv-02234-APG-BNW

**MOTION FOR LEAVE TO EXCEED  
PAGE LIMIT ON PLAINTIFF’S  
OPPOSITION TO THE LVMPD  
DEFENDANTS’ MOTION FOR  
SUMMARY JUDGMENT**

**NO HEARING REQUESTED**

25 PLAINTIFF NICHOLAS HANSEN, by and through his counsel Robert S. Melcic, of  
26 The Law Office of Robert S. Melcic, moves for leave to exceed the page limit on its *Opposition*  
27 to the LVMPD Defendants’ *Motion for Summary Judgment*. This *Motion* is brought pursuant to  
28 Local Rule 7-3(a) and (c). Hereinafter, PLAINTIFF shall be referred to as “Movant.”

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**DECLARATION OF ROBERT S. MELCIC, ESQ.**

I, Robert S. Melcic, hereby declare as follows:

1. I am the sole practitioner of the Law Office of Robert S. Melcic and am counsel of record for Movant Nicholas Hansen in the above-referenced matter.
2. I make this declaration in support of the Movant's *Motion for Leave to Exceed Page Limit* for the *Opposition* to the LVMPD Defendants' *Motion for Summary Judgment*.
3. The proposed *Opposition* to the *Motion for Summary Judgment* has been edited and reduced as much as possible to reduce extraneous information or duplication, but nevertheless stands at 32 pages, which is two pages beyond the thirty-page limit set by Local Rule 7-3(a).
4. Given the complexity of the arguments of the issues presented—and the need to look to legislative history to clarify several of the issues presented—good cause exists to allow an additional two pages of briefing in the *Opposition*.
5. Additionally, failure to allow the additional two pages will result in the omission of important arguments that will be useful to the Court's analysis of the issues presented.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 7, 2022

/s/ Robert S. Melcic

Robert S. Melcic, Esq.

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**I. LEGAL ARGUMENT**

For the reasons set forth above, and pursuant to LR 7-3(a) and (c), Movant Nicholas Hansen submits that good cause exists to grant his request to exceed the page limit by two pages in his *Opposition* to the LVMPD Defendants' *Motion for Summary Judgment*.

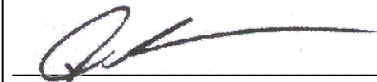
Dated this 7th Day of March, 2022.

The Law Offices of Robert S. Melcic

/s/ Robert S. Melcic  
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*Attorney for Nicholas Hansen*

**IT IS SO ORDERED**

Dated: March 8, 2022



UNITED STATES DISTRICT JUDGE